

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
DELAWARE**

DEBORAH S. SKEANS, Executrix of the ESTATE
OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE, LLC, KEY
COMMERCIAL FINANCE PROPERTIES, LLC,
EQUITY PROS, LLC, and MOBILE AGENCY,
LLC,

C.A. No. 1:18-cv-01516-CFC-MPT

MOTION FOR PERMISSIVE INTERVENTION

Now comes Jeffrey Peterson, Movant, by and through his attorney, Gregory D. Stewart, Esq. and requests to intervene in the above-captioned matter. The rules permit intervention where, “On timely Motion, the Court may permit anyone to intervene who has a claim or defense that shares with the main action a common question of law or fact. [FRCP 24(b)(1)(B)].

MEMORANDUM OF LAW

In a Supplemental Complaint filed on 15 April 2021, Mr. Peterson was for the first time drawn into this action. “On information and belief, these schemes

began with the online payday loan start-up “LoanGo”—which Billingsley created with his recurring partner in fraudulent enterprises, Jeffrey Peterson (“Peterson”), and a third party, John Keith Ayers (“Ayers”).” [Supplemental Complaint Page 11, Paragraph #32].

It should be noted that although Mr. Peterson was accused of scandalous schemes in conjunction with Mr. Billingsley, there has been no move by the Plaintiff to join Peterson as a Defendant.

In the Supplemental Complaint paragraphs #35-75, Mr. Peterson and the corporation over which he was CEO, and Mr. Billingsley, president, are painted as a criminal enterprise that swindled unwitting investors out of their money without remorse.

These false and defamatory assertions were fed to the Plaintiff’s lawyer by an individual long- harboring a grudge against Mr. Peterson, as will be evidenced in the Intervener’s *Motion to Strike* the allegations from the record, where, “The court may strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.” [FRCP 12(f)].

LAW OFFICE OF GREGORY D.
STEWART, P.A.

/s/ Gregory D. Stewart

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